

# Exhibit C

**From:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

**Sent:** Friday, May 1, 2020 2:47 PM

**To:** Kevin Polansky <[kevin.polansky@nelsonmullins.com](mailto:kevin.polansky@nelsonmullins.com)>; Christine Kingston <[christine.kingston@nelsonmullins.com](mailto:christine.kingston@nelsonmullins.com)>

**Cc:** [ted@broderick-law.com](mailto:ted@broderick-law.com); Alex Washkowitz <[alex@cwlawgrouppc.com](mailto:alex@cwlawgrouppc.com)>; Matthew McCue <[mmccue@massattorneys.net](mailto:mmccue@massattorneys.net)>

**Subject:** RE: Mantha v. QuoteWizard

Hey, Kevin. We've reviewed. First, I'll provide whatever we received from Verizon. We sent them a copy of the Court's Order, so hopefully it will be soon. I've left the compliance employee who handled our subpoena two messages, but haven't heard back yet.

Second, on your letter:

- We can confirm we're at impasse on Request No. 1 and 2, but would still be willing to send the correspondence to the subpoena recipients we've offered.
- I can confirm on 5 and 13(e) we're only seeking information related to the Plaintiff (and not putative class members)
- Thank you for confirming that there's no dispute on Request No. 9. On Request No. 8, the Plaintiff's contention is that any purported consent from the website must include a connection to the Defendant, we stand by our position that the request is valid.
- On Request No. 10, if QuoteWizard is claiming that it obtained consent through the submission on a website, compliance with the ESign Act is at issue.
- On Request No. 14, while we stand willing to send the offered correspondence, we don't intend to issue a new subpoena. However, I do believe the correspondence is sufficient to "revise[]" the request" as QuoteWizard suggests.

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**From:** Kevin Polansky <[kevin.polansky@nelsonmullins.com](mailto:kevin.polansky@nelsonmullins.com)>

**Sent:** Friday, May 1, 2020 9:52 AM

**To:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>; Christine Kingston <[christine.kingston@nelsonmullins.com](mailto:christine.kingston@nelsonmullins.com)>

Cc: [ted@broderick-law.com](mailto:ted@broderick-law.com); Alex Washkowitz <[alex@cwlawgrouppc.com](mailto:alex@cwlawgrouppc.com)>; Matthew McCue  
<[mmccue@massattorneys.net](mailto:mmccue@massattorneys.net)>  
**Subject:** RE: Mantha v. QuoteWizard

Anthony,

Let us know when you hear back from Verizon and where we stand on our objections to the other subpoenaed parties. Happy to further discuss next week.

Be well,

Kevin



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**From:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>  
**Sent:** Tuesday, April 28, 2020 11:04 AM  
**To:** Kevin Polansky <[kevin.polansky@nelsonmullins.com](mailto:kevin.polansky@nelsonmullins.com)>; Christine Kingston <[christine.kingston@nelsonmullins.com](mailto:christine.kingston@nelsonmullins.com)>  
**Cc:** [ted@broderick-law.com](mailto:ted@broderick-law.com); Alex Washkowitz <[alex@cwlawgrouppc.com](mailto:alex@cwlawgrouppc.com)>; Matthew McCue  
<[mmccue@massattorneys.net](mailto:mmccue@massattorneys.net)>  
**Subject:** RE: Mantha v. QuoteWizard

◀ **External Email** ▶ - From: [anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)

Thanks for the quick response – we will file now.

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**From:** Kevin Polansky <[kevin.polansky@nelsonmullins.com](mailto:kevin.polansky@nelsonmullins.com)>  
**Sent:** Tuesday, April 28, 2020 10:59 AM  
**To:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>; Christine Kingston <[christine.kingston@nelsonmullins.com](mailto:christine.kingston@nelsonmullins.com)>  
**Cc:** [ted@broderick-law.com](mailto:ted@broderick-law.com); Alex Washkowitz <[alex@cwlawgrouppc.com](mailto:alex@cwlawgrouppc.com)>; Matthew McCue  
<[mmccue@massattorneys.net](mailto:mmccue@massattorneys.net)>  
**Subject:** RE: Mantha v. QuoteWizard

Anthony,

No objection, you can file.

Kevin



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**From:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>  
**Sent:** Tuesday, April 28, 2020 10:46 AM  
**To:** Kevin Polansky <[kevin.polansky@nelsonmullins.com](mailto:kevin.polansky@nelsonmullins.com)>; Christine Kingston <[christine.kingston@nelsonmullins.com](mailto:christine.kingston@nelsonmullins.com)>  
**Cc:** [ted@broderick-law.com](mailto:ted@broderick-law.com); Alex Washkowitz <[alex@cwlawgroup.com](mailto:alex@cwlawgroup.com)>; Matthew McCue  
<[mmccue@massattorneys.net](mailto:mmccue@massattorneys.net)>  
**Subject:** Mantha v. QuoteWizard

◀ **External Email** ▶ - From: [anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)

Counsel:

We received the attached response from Verizon to the Plaintiff's subpoena.

Attached is a motion based on what we've filed in similar circumstances. Please let us know if we may represent that the relief sought in this motion is unopposed. Alternatively, please consider this an attempt to confer pursuant to LR 7.1.

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measures and interpretations that may be described herein are subject to change. The firm is taking appropriate precautionary actions and has implemented plans to ensure the continuation of all firm services to clients from both in office and remote work arrangements across our 25 geographically dispersed offices. [Click here to visit the Nelson Mullins Coronavirus Resources page.](#)

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**From:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

**Sent:** Friday, April 24, 2020 8:59 AM

**To:** Gerri Robillard <[gerri.robillard@nelsonmullins.com](mailto:gerri.robillard@nelsonmullins.com)>; [mmccue@massattorneys.net](mailto:mmccue@massattorneys.net); [ted@broderick-law.com](mailto:ted@broderick-law.com); [alex@cwlawgrouppc.com](mailto:alex@cwlawgrouppc.com)

**Cc:** Kevin Polansky <[kevin.polansky@nelsonmullins.com](mailto:kevin.polansky@nelsonmullins.com)>

**Subject:** RE: Joseph Mantha v. QuoteWizard.com, LLC, C.A. No. 19-cv-12235-LTS

Kevin:

We've reviewed the letters. They all appear to address the same substantive points, so we'll respond to them at once:

- Regarding Request No. 1 and 2, we'd be willing to send correspondence to the subpoena recipients that states that we're only seeking contracts or agreements that mention a process or policy for obtaining consent as part of the relationship.
- For Request No. 5 and 13(e), the Court's bifurcation is related to Quote Wizard's defense of consent. While it currently identifies a single website visited on a single day, unless Quote Wizard is agreeing to forego any other consent defense throughout this litigation, we believe the most efficient approach is to identify any purported consent for the Plaintiff.
- Request No. 8 and 9 are related to the correlation, if any, between Quote Wizard and [www.snappyautoinsurance.com](http://www.snappyautoinsurance.com). That is relevant to a defense where Quote Wizard is relying on that website.
- For Request No. 10, any disclosures that purport to be compliant with the E-Sign Act on August 5, 2019 would relate directly to the Plaintiff.
- Finally, on Request No. 14, we'd be willing to send correspondence to the subpoena recipients that states that we're only seeking correspondence insofar as it relates to consent for the Plaintiff.

Regards,

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**From:** Gerri Robillard <[gerri.robillard@nelsonmullins.com](mailto:gerri.robillard@nelsonmullins.com)>  
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**Cc:** Kevin Polansky <[kevin.polansky@nelsonmullins.com](mailto:kevin.polansky@nelsonmullins.com)>  
**Subject:** Joseph Mantha v. QuoteWizard.com, LLC, C.A. No. 19-cv-12235-LTS

Good Afternoon,

On behalf of Attorney Polansky, attached please find correspondence in connection with the above-subject matter. These have also been sent by overnight mail to you.

Thank you,  
Gerri



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